

Rev. Rul. 67-149, 1967-1 C.B. 133

An organization was formed for the purpose of providing financial assistance to several different types of organizations which are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954. It carries on no operations other than to receive contributions and incidental investment income and to make distributions of income to such exempt organizations at periodic intervals. The organization does not accumulate its investment income.

Held, the organization is exempt from Federal income tax under section 501(c)(3) of the Code.

This Revenue Ruling restates under current law the position set forth in I.T. 1945, C.B. III-1, 273 (1924). Therefore, I.T. 1945 is hereby superseded.